

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CHRISTOPHER PFEILER,

Plaintiff,

v.

**HERITAGE DEVELOPMENT
COMPANY,**

Defendant.

CASE NO. 1:20-cv-02002

JUDGE DONALD C. NUGENT

**JOINT MOTION FOR APPROVAL OF
SETTLEMENT AND FOR DISMISSAL
WITH PREJUDICE**

GRANTED: ☒ DENIED: ☐
IT IS SO ORDERED.
Donald C. Nugent 2/25/21
U.S. DISTRICT JUDGE

Plaintiff Christopher Pfeiler (“Plaintiff”) and Defendant Heritage Development Company (“Defendant”) respectfully move this Court to approve the Settlement and Release Agreement (“Settlement”) reached by the parties.¹ The Settlement seeks to resolve all claims Plaintiff has or could have asserted against Defendant under the Fair Labor Standards Act 29 U.S.C. §§ 201, *et seq.* (“FLSA”) and any applicable state and local wage-and-hour laws.

Plaintiff respectfully submits that the Settlement is fair and reasonable, and that it satisfies the criteria for approval under 29 U.S.C. § 216. The Settlement was achieved through diligent and thorough negotiations between the Parties’ counsel, after a significant amount of discovery had taken place. If approved by the Court, the Settlement will result in a fair and reasonable settlement payment to Plaintiff.

I. THE ACTION

On September 4, 2020, Plaintiff filed a Complaint against Defendant, asserting a claim for failure to pay overtime compensation in violation of the FLSA. (ECF #1). Specifically, Plaintiff

¹ Because the Settlement contains a confidentiality clause, Defendant will be filing an unopposed Motion to file the Settlement under seal.